

REMARKS

Claims 14-19 and 21-25 are pending. New Claims 23-25 are added and Claim 20 is canceled in this Response.

Double Patenting

A Terminal Disclaimer accompanies this Response to overcome the obviousness type double patenting rejection.

Rejections Based On Kovac

Claims 14-15 and 19 were rejected as being obvious over Kovac (6,525,429).

Claims 14 and 15 recite a protective material fully curable by exposure to ultraviolet light and shrinking 10% or less by volume upon curing. Claim 19 recites coating a semiconductor die with a polymer that is fully curable by exposure to ultraviolet light and shrinks 10% or less by volume upon curing. Kovac suggests one or the other of these features, but not both. Kovac teaches "pads ... cured or partially cured by heating or exposing them to ultra violet light or a combination thereof...." Kovac, column 5, lines 31-35. However, the Dow 577 elastomer that Kovac says shrinks about 5% is heat cured, not light cured. Kovac, column 5, lines 35-38. There is nothing in Kovac that suggests he discovered or even contemplated a protective material that is fully UV light curable and shrinks 10% or less, as claimed. If the Examiner disagrees, she is respectfully requested to specifically point out *and explain* those passages in Kovac that teach a protective material exhibiting both features. Absent such a showing, the rejections should be withdrawn.

Kovac also does not disclose a protective material surrounding (Claims 14 and 15) or coating (Claim 19) substantially all of the semiconductor die. Compliant filler 170 in Kovac coats only one surface of the die 120. For this additional reason, Claims 14, 15 and 19 distinguish patentably over Kovac.

Rejections Based On Xu

Claims 15-22 were rejected under Section 103 as being obvious over Xu (6168898) in view of Higgins (5583370). Xu teaches the use of about half the substances known to mankind to provide "a permanent photoresist that can be used as a permanent dielectric in electronic circuits." Xu column 2, lines 15-16. The only uses

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for his dielectric that Xu discloses in his patent are microvias and solder masks. Xu column 1, lines 59-63 and all of Examples 1-12.

The fact that Xu lists phenol-formaldehyde novolac resins and triaryl sulfonium hexafluorophosphate as suitable materials (along with a veritable laundry list of other materials) for his dielectric does not render obvious any and all uses for such materials. Specifically, there is nothing in Xu that even remotely suggests using these materials for semiconductor packaging. That is to say, there is nothing in Xu that can reasonably be deemed to teach or suggest these materials could or should be used as constituent parts of a protective material covering substantially all of a semiconductor die and at least a portion of the leads connected to the die (Claim 15) or coating substantially all of a semiconductor die (Claim 19). Again, if the Examiner disagrees, she is respectfully requested to specifically point out **and explain** those passages in Xu that teach or even suggest a protective material covering substantially all of a semiconductor die. Absent such a showing, the rejections should be withdrawn.

Applicant notes also that Claims 16 and 17 of this application contain all of the limitations of Claims 2 and 3 of the parent, now patent no. 6674158, which were allowed over Xu.

New Claims 23-25

New Claims 23-25 recite additional features not disclosed in the art of record.

Respectfully submitted,



Steven R. Ormiston
Attorney for Applicant
Registration No. 35,974
(208) 433-1991, ext. 204

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